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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF THE  
PARTIES' JOINT DISCOVERY LETTER**

Pursuant to Civil Local Rules 79-5 and 7-11, and the Stipulated Protective Order entered by the Court on August 17, 2018 (ECF No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal. Specifically, Plaintiffs move for leave to file under seal the following portions of the parties’ Joint Discovery Letter regarding Custodians (“Joint Letter”) under seal:

- a. Limited portions of the paragraphs in Section I.B., discussing Justin Osofsky, Chamath Palihapitiya and Javier Olivan, Sam Lessin, Andrew Bosworth, Antonia Garcia-Martinez, and Mustafa Khan.
- b. Limited portions of the paragraphs in Section II.B, discussing Mustafa Khan.
- c. The quotation, in Section III, Plaintiffs’ Reply, to the document Bates Numbered FB-CA-MDL-00405239.
- d. The two pages comprising Exhibit B, Bates Numbered FB-CA-MDL-00177962 and 0177965, to the Joint Letter Brief (cited in Plaintiffs’ Reply).
- e. Limited portions of the paragraph discussing Khan on page 19.

Plaintiffs move for leave to file these portions of the Joint Letter under seal because the Letter contains specific reference, to documents that defendant Facebook, Inc. has designated “Confidential” pursuant to the Protective Order. *See* accompanying Declaration of Anne K. Davis (“Davis Decl.”), ¶ 5.

Consistent with Rule 79-5(e), Facebook, as the Designating Party, must file a declaration as required by subsection 79-5(d)(1)(A) establishing that all of the designated material is sealable, or the information at issue will be made part of the public record. Pursuant to this Court’s Standing Order, the document at issue has been provided to the Court by appropriately filing it electronically under seal in an unredacted form, and by submitting chambers copies. Civil Standing Order for Magistrate Judge Jacqueline Scott Corley, p. 3.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: May 14, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser  
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By: /s/ Lesley E. Weaver  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of May, 2020, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

**CERTIFICATE OF SERVICE**

I, Lesley E. Weaver, hereby certify that on May 14, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Lesley E. Weaver

Lesley E. Weaver